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February 22, 2010

VIA FACSIMILE AND ECF FILING

Honorable Joel Schneider, U.S.M.J.
Mitchell H. Cohen Building & U.S. Courthouse
Chambers 3C, 4th & Cooper Streets - Room 1050
Camden, New Jersey 08101

Re: Opperman v. Allstate New Jersey Insurance Company, et al.
Civil No. 07-cv-1887 (RMB)(JS)

Dear Judge Schneider:

As the Court knows, together with Robert King, Jr., Esq., *pro hac vice*, of Sonnenschein Nath & Rosenthal LLP, we represent Allstate New Jersey Insurance Company ("ANJ") in the above-captioned matter. We had scheduled the deposition of Rachelle Richards (the daughter of Plaintiff Inez Murray) for 9:30 a.m. tomorrow morning. We had trouble serving her with a subpoena, but were finally able to do so. She contacted Mr. King's office this afternoon and stated that she could not attend the deposition tomorrow because of work obligations, and would prefer to reschedule for March 4, beginning at 5:30 p.m.

In addition, Barry Maxwell (the son of Plaintiff Inez Murray) contacted Mr. King today and he would also like to move his deposition date to March 4 at 3:00 p.m.

Because Ms. Richards and Mr. Maxwell are third-party witnesses, ANJ wanted to accommodate them, if possible. Mr. King's office has spoken with Michael DeBenedictis, one of Plaintiffs' counsel, who has agreed to reschedule the depositions, subject to this Court's approval.

We would respectfully request that the court approve this change in the scheduled depositions.

Respectfully submitted,
ADOKSO & YOSS LLP

By: Steven Gerber
Steven Gerber

SG/ch

cc: All Counsel via ECF
Robert H. King, Jr., Esq., *pro hac vice*

So Ordered this 22nd day
of February, 2010
Joel Schneider
JOEL SCHNEIDER, USMJ